

# **EXHIBIT 19**

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1 UNITED STATES DISTRICT COURT  
 2 NORTHERN DISTRICT OF CALIFORNIA  
 3 SAN FRANCISCO DIVISION  
 4

5 IN RE GOOGLE PLAY STORE )  
 ANTITRUST LITIGATION )

6 THIS DOCUMENT RELATES TO: )

CASE NO.

7 3:21-MD-02981-JD

8 STATE OF UTAH, ET AL. V. )

GOOGLE, LLC, ET AL., )

CASE NO. 3:21-CV-05227-JD )

9 MATCH GROUP, LLC ET AL. V. )

10 GOOGLE, LLC ET AL., )

CASE NO. 3:22-CV-02746-JD )

11 EPIC GAMES, INC. V. GOOGLE, )

12 LLC ET AL., )

CASE NO. 3:20-CV-05671-JD )

13 IN RE GOOGLE PLAY CONSUMER )

14 ANTITRUST LITIGATION, )

CASE NO. 3:20-CV-05761-JD )

15 \_\_\_\_\_ )  
 16  
 17 \*\* PROVISIONALLY HIGHLY CONFIDENTIAL \*\*  
 18

19 PROCEEDINGS OF  
 20 VIDEOTAPED DEPOSITION OF STEVEN SCHWARTZ, PH.D.  
 21 TUESDAY, MARCH 28, 2023  
 22  
 23

24 REPORTED BY: REAGAN EVANS, RPR, RMR, CRR, CCRR,  
 25 CLR, CRC, CA CSR NO. 8176

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1 plaintiff governments.

2 THE VIDEOGRAPHER: Would any of our remote  
3 participants care to state their appearances on the  
4 record today?

5 Hearing nothing, would the court reporter  
6 please swear in the witness, and then Counsel may  
7 proceed?

8 STEVEN SCHWARTZ, Ph.D.,  
9 having been first duly sworn by the reporter,  
10 was examined and testified as follows:

11  
12 THE WITNESS: I do.

13 THE REPORTER: Thank you.

14  
15 EXAMINATION

16 BY MR. RAPHAEL:

17 Q Good morning, Dr. Schwartz.

18 A Good morning.

19 Q Could you state your name for the record.

20 A Steven Schwartz.

21 Q And have you been deposed a number of  
22 times, Dr. Schwartz?

23 A I have.

24 Q About how many times?

25 A Certainly north of 30. Whether it's north

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1 Q Okay.

2 Did you -- strike that.

3 Were you offered any academic positions  
4 after you thought about leaving Miami University?

5 MR. PURPURA: Objection. Form.

6 THE WITNESS: That's a long time ago.

7 My recollection is that at the time that I  
8 accepted the job at NERA, I had accepted three or  
9 four invitations to visit campus for different  
10 academic positions and to present seminars.

11 When the NERA offer came, I accepted it,  
12 and I obviously cancelled those invitations.

13 BY MR. RAPHAEL:

14 Q Okay.

15 Have you ever published any paper in any  
16 peer-reviewed journal?

17 A I have.

18 Q Okay.

19 How many?

20 A I don't have an exact number in mind.  
21 Somewhere between five and ten.

22 Q Okay.

23 Now, I've previously marked as  
24 Exhibits 1106, 1107, and 1108 your reports that you  
25 submitted in this matter.

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1 (Whereupon Schwartz Exhibit 1106  
2 was marked for identification and  
3 attached hereto.)

4 (Whereupon Schwartz Exhibit 1107  
5 was marked for identification and  
6 attached hereto.)

7 (Whereupon Schwartz Exhibit 1108  
8 was marked for identification and  
9 attached hereto.)

10 MR. RAPHAEL: For the record, 1106 is your  
11 opening report.

12 1107 is your rebuttal report.

13 And 1108 is your reply report.

14 BY MR. RAPHAEL:

15 Q I see you've got paper copies of those next  
16 to you, and I understand from Counsel that those are  
17 clean without any notes; is that right?

18 MR. HARSHBARGER: That's correct.

19 BY MR. RAPHAEL:

20 Q Okay.

21 So you should feel free to consult those if  
22 it's easier than on the screen. I'm totally fine  
23 with that.

24 A Okay. Thank you.

25 Q Who wrote the reports that you submitted in

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1       this matter, Dr. Schwartz?

2               MR. PURPURA:   Objection.   Form.

3               THE WITNESS:   In the end, I am responsible  
4       for everything that was written either because I  
5       wrote it myself, edited it myself, or reviewed what  
6       was written, but I did not -- if -- I did not write  
7       every word that is in any of these or all of these  
8       reports.

9       BY MR. RAPHAEL:

10            Q     Can you give me an estimate of about how --  
11       what portion of your report you personally wrote  
12       yourself.

13            A     My staff would tell you that I rewrote or  
14       edited probably everything.

15                   In terms of portions of the report where I  
16       took the lead in writing, probably a quarter where I  
17       took the lead where I would have written the  
18       original draft.   Probably the remaining 75 percent,  
19       an initial draft was written by someone else  
20       pursuant to an outline that I had prepared.

21            Q     Okay.

22                   And in writing your reports, you used your  
23       words carefully?

24            A     Yes.

25            Q     And you have been an expert a number of

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1 STATE OF CALIFORNIA )  
2 COUNTY OF LOS ANGELES ) ss.  
3

4 I, Reagan Evans, RPR, RMR, CRR, CCRR, CLR, CRC,  
5 CSR No. 8176, in and for the State of California, do  
6 hereby certify:

7 That prior to being examined, the witness named  
8 in the foregoing deposition was by me duly sworn to  
9 testify to the truth, the whole truth, and nothing  
10 but the truth;

11 That said remote deposition was taken down by me  
12 in shorthand at the time and place therein named and  
13 thereafter reduced to typewriting under my  
14 direction, and the same is a true, correct, and  
15 complete transcript of said proceedings;

16 That if the foregoing pertains to the original  
17 transcript of a deposition in a federal case, before  
18 completion of the proceedings, review of the  
19 transcript {xx} was { } was not required.

20 I further certify that I am not interested in  
21 the event of the action.

22 Witness my hand this 28th day of March, 2023.  
23

24   
\_\_\_\_\_

25 Certified Shorthand Reporter  
for the State of California